



September 20, 2019

Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Community Housing Improvement Program, et al. v. City of New York, et al., 19-cv-4087

Dear Judge Brodie:

We write regarding (1) our September 6, 2019 letter requesting a conference concerning our proposed motion pursuant to F.R.C.P. 24 to intervene on behalf of N.Y. Tenants and Neighbors (T&N), and Community Voices Heard (CVH) (Dkt. 31) and (2) the Court's September 12, 2019 Order.

With respect to our September 6, 2019 letter, we respectfully request that the Court also permit the Coalition for the Homeless (the Coalition) to move to intervene jointly with T&N and CVH. The Coalition is the nation's oldest direct service organization helping homeless men, women, and children escape homelessness by finding affordable housing, furthering its core mission of developing and implementing cost-effective strategies to end mass homelessness in New York City. Plaintiffs' suit, if successful, would have a dramatic impact on the Coalition's efforts to combat homelessness in New York City and would cause the Coalition to divert substantial resources toward helping those rendered newly homeless from the elimination of rent stabilization protection. The Coalition thus seeks to join T&N and CVH's motion to intervene and, if the motion is granted, requests leave to file a joint motion to dismiss with T&N and CVH.

Plaintiffs have informed the Coalition that they consent to the Coalition's intervention on the understanding that the Coalition will make all filings jointly with T&N and CVH on the same schedule as Defendants.

With respect to the Court's September 12, 2019 Order, we respectfully request that the Court clarify whether a formal motion and briefing is necessary in light of Plaintiffs' consent to intervention.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Faith Gay", written over a horizontal line.

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